



# United States Department of the Interior

## BUREAU OF LAND MANAGEMENT

Cedar City Field Office  
176 East DL Sargent Drive  
Cedar City, Utah 84720

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DIVISION OF  
OIL, GAS AND MINING

m/21/004

In Reply Refer To:  
UT-040  
3809: UTU-67116

July 25, 2000

Mr. Lynn Kunzler, Reclamation Specialist  
State of Utah, Department of Natural Resources  
Division of Oil, Gas, and Minerals  
1594 West North Temple Drive, Suite 1210  
P.O. Box 145801  
Salt Lake City, UT 84114-5801

Dear Mr. Kunzler:

This letter is in regard to the mill tailings impoundment associated with the Escalante Silver Mine, Division of Oil, Gas, and Mining (DOGM) File No. M/021/004, Iron County, Utah. The mill tailings impoundment area is located entirely on BLM land managed through this office. You had contacted me last week by telephone and requested that this office inspect the tailings area and report our findings on the suitability of this area for reclamation release.

This office is satisfied that the reclamation of the fenced tailings impoundment area is adequate; however, there is a noxious weed control issue which we would like to discuss with DOGM and the permit holder, Hecla Mining Company, before we recommend final reclamation release for this area.

As you are aware, two years ago an outbreak of a noxious weed, diffuse knapweed, was found in and adjacent to the impoundment area. The permittee was immediately contacted and a control effort initiated. After two years of herbicide spraying of the affected area, no plants have been found in this area. While this is encouraging, we fear that this may not be sufficient evidence that the problem is adequately resolved. As you know, the seeds from knapweed maintain viability for many years. If viable seeds are still present in the area, we could have another outbreak next year if seed germination conditions are more favorable than this year.

We acknowledge that it is not reasonable to perpetually delay reclamation release until the weed problem is resolved. However, every additional year that the area can be inspected for knapweed seedlings and timely sprayed before they mature reduces the risk of future serious outbreaks by reducing the viable seed stock and allowing competing desirable species to become even better established. We would like to negotiate some means to inspect the area and, if necessary, spray the area annually until all the other remaining aspects of permittee's reclamation responsibility in the overall permit area are fulfilled. If such an arrangement could be made, this office will immediately recommend release of the impoundment area from all other reclamation liabilities.

I can be reached by mail at the letterhead address, by phone at (435) 865-3040, and by email at [eginouve@ut.blm.gov](mailto:eginouve@ut.blm.gov).

Sincerely,

Ed Ginouves  
Mining Engineer

xc: Mr. Gary Nelson, Idle Properties Manager, Hecla Mining Company, 6500 Mineral Drive, Coeur d'Alene, Idaho 83814